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February 3, 2025

**VIA ECF**

Honorable Ronnie Abrams  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: **Donna Hedges v. Eden Brands Inc.**  
**Case No. 1:24-cv-07692-RA**

Honorable Judge Abrams:

This firm represents Defendant Eden Brands Inc., in this matter. On November 7, 2024, the Parties agreed to the filing of a Waiver of Service (DE #7). The Answer to the Complaint was due January 3, 2025. In addition, this Court entered an Order on October 11, 2024, (DE #6) directing the Parties to file a Joint Letter 45 days after the Complaint was served which deadline is December 23, 2024. A first extension of time was filed December 17, 2024, setting the deadlines to Answer the Complaint and to file the Joint letter to February 3, 2025, and February 23, 2025, respectively (DE #10). The Parties are working diligently to resolve this case out of Court and require additional time to continue their negotiations. The Parties request that this Honorable Court grant an extension as follows:

- Defendant to respond to the Complaint by March 5, 2025, and,
- for the Parties to file the Joint Letter by to March 25, 2025.

This is the second request for an extension of time to respond to the Complaint and file the Joint Letter. The request is brought in good faith and does not intend to delay the case. Neither the Parties nor the Court will be prejudiced if the brief extension requested is granted. Plaintiff's counsel consents to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Carol C. Lumpkin  
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